

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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WILLOW FRIEDLAND, STEVEN GONZALEZ,  
and MIRIAM SIERADZKI,

Plaintiffs,

-against-

CITY OF NEW YORK, FORMER MAYOR BILL  
DE BLASIO; FORMER NEW YORK CITY POLICE  
DEPARTMENT COMMISSIONER DERMOT  
SHEA; and FORMER NEW YORK CITY POLICE  
DEPARTMENT CHIEF OF DEPARTMENT  
TERENCE MONAHAN,

Defendants.  
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**DECLARATION OF YINI  
ZHANG IN SUPPORT OF  
DEFENDANTS' RENEWED  
MOTION TO DISMISS THE  
SECOND AMENDED  
COMPLAINT PURSUANT  
TO RULE 12(B)(6)**

24-CV-07064 (DLC)

**YINI ZHANG**, an attorney duly admitted to practice in the United States District Court for the Southern District of New York, declares pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York. I am the attorney assigned to the defense of this action. As such, I am familiar with the facts and circumstances stated herein.

2. I submit this declaration in support of Defendants' Motion to Dismiss the Second Amended Complaint Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure. In support of their motion, defendants submit the exhibits describe below.

3. Annexed hereto as **Exhibit "A"** is a true and correct copy of the New York City Police Department Summons Number 4440045614 for Incident Date June 2, 2020 at 12:00 a.m. issued to plaintiff Willow Friedland, previously known as Ilan Friedland, in connection with the arrest in question.

4. Annexed hereto as **Exhibit “B”** is a true and correct copy of the New York City Police Department Summons Number 4440045600 for Incident Date June 2, 2020 at 12:00 a.m. issued to plaintiff Steven Gonzalez in connection with the arrest in question.

5. Annexed hereto as **Exhibit “C”** is a true and correct copy of the New York City Police Department Summons Number 4440045629 for Incident Date June 2, 2020 at 12:00 a.m. issued to plaintiff Miriam Sieradzki in connection with the arrest in question.

Dated: New York, New York  
May 30, 2025

/s/ Yini Zhang  
Yini Zhang  
Senior Counsel